

In the Matter of

Amendment of Part 97.201(b) of the
Commission's Rules Regarding Auxiliary
Operation in the Amateur Service

By W. Lee McVey, P.E.,

To: Chief, Public Safety and Private Wireless
Division, Wireless Telecommunications
Bureau

This subject Petition submitted by the Kenwood Corporation should not be adopted for reasons cited below in addition to those submitted in my Comment filed October 29, 2001.

The *Sky Command* system, as explained in subsequent commentary to this Petition purports not to control, but merely to broadcast received signals and or noise from high frequency radios on the 2 Meter band. It is stated that all control of this system occurs on the 70cM band and that operation on the 2M band would be the same as with a 2M remote base

station. Control must be two-way, fed forward and fed back. Therefore, if the 70cM channel only provides one-way information to the remote/auxiliary station, then the use of the 2M band as the feedback or return path for control information amounts to use of 2M for control in violation of 97.201(b).

B. Broadcast of Amateur Communications

It is not good operating practice to transmit on a frequency without first listening to the transmitter's coverage area from the same location to ensure that no communications within its coverage area are interfered with. Using a small handheld transceiver to listen on a selected 2M frequency is not equivalent to monitoring a frequency from a fixed base station location employing a 2M gain antenna. Weak or imperceivable signals received on a handheld could easily be interfered with by a base station with much greater effective radiated power. Unlike 2M remote base systems in widespread use which receive and transmit on a 2M frequency with a common antenna, this system only broadcasts its output on a selected frequency, not effectively monitoring the 2M frequency within its coverage area prior to and during use.

C. Frequency Coordination

Amateur repeater and remote base systems have traditionally been coordinated as to frequencies of operation and coverage areas and assigned operating frequencies to ensure non-interference. Widespread use of the proposed, frequency agile system in even moderately elevated terrain found in many parts of the country could result in interference to other users or to coordinated remote base systems.

A clear and compelling need for changing the current band use restrictions on amateur auxiliary station control has not been demonstrated.

Respectfully Submitted,

(electronically)

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